

CONOCO INCORPORATED

DENVER REFINERY - MAIN PLANT

JULY 8, 1980

SPCC PLAN

## SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN

### PART I GENERAL INFORMATION

1. Name of facility Conoco Incorporated - Denver Refinery - Main Plant
2. Type of facility Petroleum Refinery
3. Location of facility 5801 Brighton Blvd.  
Commerce City, Colorado 80022 Adams County
4. Name and address of owner or operator:  
Name Conoco Inc.  
Address 5801 Brighton Blvd.  
Commerce City, Colorado 80022
5. Designated person accountable for oil spill prevention at facility:  
Name and title Eldon W. Carpenter, Chief Refinery Chemist
6. Facility experienced a reportable oil spill event during the twelve months prior to Jan. 10, 1974 (effective date of 40 CFR, Part 112). (If YES, complete Attachment #1.) \_\_\_\_\_

#### MANAGEMENT APPROVAL

This SPCC Plan will be implemented as herein described.

Signature \_\_\_\_\_

Name \_\_\_\_\_

Title \_\_\_\_\_

D.R. Unruh

Denver Refinery Manager

#### CERTIFICATION

I hereby certify that I have examined the facility, and being familiar with the provisions of 40 CFR, Part 112, attest that this SPCC Plan has been prepared in accordance with good engineering practices.

(Seal)

Date

July 18, 1980

James D. Buxton

Printed Name of Registered Professional Engineer

Signature of Registered Professional Engineer

Registration No. 13167

State Colorado

PART I  
GENERAL INFORMATION

7. Potential Spills — Prediction & Control:

<u>Source</u>	<u>Major Type of Failure</u>	<u>Total Quantity (bbls)</u>	<u>Rate (bbls/hr)</u>	<u>Direction of Flow*</u>	<u>Secondary Containment</u>
1. Process equipment or vessel failure		Several hundred barrels		Into sewers	Lagoons
2. Storage tank	Tank leakage	Up to 120,000 bbls		Only around tank	Earthen or concrete dike
3. Loading rack	Equipment or line failure			Into sewer	Lagoons
4. Transfer lines	Rupture or leakage			To west-northwest	Catchment basin or sewers to lagoons
5. API oil trap overflow due to heavy rain					Catchment basin with baffle.

Discussion:

All sewers, in the refinery, including process area and storm sewers pass through final three lagoons where a spill can be contained. Drainage from refinery travels generally to the west-northwest.

The three final lagoons are located in series with an underflow baffle ahead of the outfall. The baffle extends three feet above the water level so that oil separation would back up behind this baffle. Also the lagoons are designed so that the outfall gate can be closed which would allow a back up of material in all three lagoons. Each lagoon will retain approximately 800,000 gallons of liquid.

If the API oil separators or surface drains should overflow dikes have been installed to direct the overflow into the lagoons for oil separation.

\*Attach map if appropriate.

Name of facility CONOCO INC. - Denver Refinery - Main Plant

Operator CONOCO INC.

**PART I  
GENERAL INFORMATION**

[Response to statements should be: YES, NO, or NA (Not Applicable).]

8. Containment or diversionary structures or equipment to prevent oil from reaching navigable waters are practicable. (If NO, complete Attachment #2.) Yes

9. **Inspections and Records**

- A. The required inspections follow written procedures. Yes

- B. The written procedures and a record of inspections, signed by the appropriate supervisor or inspector, are attached. Yes

Discussion:

See letter attached.

10. **Personnel, Training, and Spill Prevention Procedures**

- A. Personnel are properly instructed in the following:

(1) operation and maintenance of equipment to prevent oil discharges, and Yes

(2) applicable pollution control laws, rules, and regulations. Yes

Describe procedures employed for instruction:

As part of the overall refinery training, each person who might or could be involved in oil spill prevention is subjected annually to a lecture covering their responsibility in this area as well as defining the pollution laws, rules and regulations.

- B. Scheduled prevention briefings for the operating personnel are conducted frequently enough to assure adequate understanding of the SPCC Plan. Yes

Describe briefing program:

Along with the above training, the SPCC plan will be described and opened for discussion and questions.

Name of facility Conoco Inc. - Denver Refinery - Main Plant

Operator Conoco Inc.

**PART II, ALTERNATE A  
DESIGN AND OPERATING INFORMATION  
ONSHORE FACILITY (EXCLUDING PRODUCTION)**

**A. Facility Drainage**

1. Drainage from diked storage areas is controlled as follows (include operating description of valves, pumps, ejectors, etc. (Note: Flapper-type valves should not be used):

Drainage from dike areas is controlled through a manually operated  
gate valve. This valve is chained and locked closed and opened for  
draining only after approval from the refinery environmentalist or in  
an emergency. Records will be maintained for three years on water  
tested for disposal from these diked areas.

2. Drainage from undiked areas is controlled as follows (include description of ponds, lagoons, or catchment basins and methods of retaining and returning oil to facility):

All sewers pass through lagoons with an underflow baffle.

Any oil collected is skimmed and pumped back to holding tank for collection.

Dikes will direct runoff water into lagoons equipped with underflow  
baffles. It is skimmed from lagoons and returned to holding tank.

3. The procedure for supervising the drainage of rain water from secondary containment into a storm drain or an open watercourse is as follows (include description of (a) inspection for pollutants, and (b) method of valving security). (A record of inspection and drainage events is to be maintained on a form similar to Attachment #3):

The water is checked for visual oil and the PH of a representative sample  
is determined. Except in case of emergency, the water is drained during  
daylight hours only under the supervision of the Chief Refinery Chemist.

All drainage valves are chained and locked closed.

While water is being checked for visual oil and the pH, the COD and  
oil and grease content should also be determined.

Name of facility Conoco Inc. - Denver Refinery - Main Plant

Operator Conoco Inc.

PART II, ALTERNATE A  
DESIGN AND OPERATING INFORMATION  
ONSHORE FACILITY (EXCLUDING PRODUCTION)

[Response to statements should be: YES, NO, or NA (Not Applicable).]

B. Bulk Storage Tanks

1. Describe tank design, materials of construction, fail-safe engineering features, and if needed, corrosion protection: Spherical, horizontal or vertical cylindrical steel tanks designed with maximum stress 21,000 psi, equipped with vents, pressure or pressure/vacuum relief valves as required by operating conditions. Tanks are periodically inspected with non-destructive metal thickness determination techniques. (Ultrasonic)

2. Describe secondary containment design, construction materials, and volume: \_\_\_\_\_

There are both earthen and concrete dikes - completely enclosing tankage. The containment volume meets NFPA code #30 and Continental Oil Engineering Standards.

3. Describe tank inspection methods, procedures, and record keeping: \_\_\_\_\_

Storage tanks are visually inspected daily for signs of leakage. Tanks are periodically inspected by non-destructive metal thickness determination techniques (Sonoray or similar). Records of last inspection are on file.

4. Internal heating coil leakage is controlled by one or more of the following control factors:

(a) Monitoring the steam return or exhaust lines for oil. No

Describe monitoring procedure: \_\_\_\_\_

(b) Passing the steam return or exhaust lines through a settling tank, skimmer, or other separation system. Yes

(c) Installing external heating systems. No

5. Disposal facilities for plant effluents discharged into navigable waters are observed frequently for indication of possible upsets which may cause an oil spill event. Yes

Describe method and frequency of observations: \_\_\_\_\_

Foremen are instructed to daily inspect the effluent water for possible signs of oil.

Name of facility Conoco Inc. - Denver Refinery - Main Plant

Operator Conoco Inc.

PART II, ALTERNATE A  
DESIGN AND OPERATING INFORMATION  
ONSHORE FACILITY (EXCLUDING PRODUCTION)

[Response to statements should be: YES, NO, or NA (Not Applicable).]

C. Facility Transfer Operations, Pumping, and In-plant Process

1. Corrosion protection for buried pipelines:

- (a) Pipelines are wrapped and coated to reduce corrosion. Yes
- (b) Cathodic protection is provided for pipelines if determined necessary by electrolytic testing. No
- (c) When a pipeline section is exposed, it is examined and corrective action taken as necessary. Yes

2. Pipeline terminal connections are capped or blank-flanged and marked if the pipeline is not in service or on standby service for extended periods. Yes

Describe criteria for determining when to cap or blank-flange: \_\_\_\_\_

If there is a possibility of oil pressure getting to the open end.

3. Pipe supports are designed to minimize abrasion and corrosion and allow for expansion and contraction. Yes

Describe pipe support design: \_\_\_\_\_

Pipe supports are constructed of appropriate steel structural shapes. Design and spacing limits stress in piping and supports to safety factor of 4. In operating unit areas pipe supports are fireproofed (Conoco standards A-1 pipe support design) to provide a 3 hour fire resistance rating (Conoco standard J).

4. Describe procedures for regularly examining all above-ground valves and pipelines (including flange joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces): \_\_\_\_\_

Manpower on all equipment is maintained on a 24-hour basis daily, therefore, part of their responsibility is to constantly be alert for any oil leakage at any point in the refinery.

5. Describe procedures for warning vehicles entering the facility to avoid damaging above-ground piping: \_\_\_\_\_

Signs are posted at entrance gates warning of overhead pipelines.

Name of facility Conoco Inc. - Denver Refinery - Main Plant

Operator Conoco Inc.

**PART II, ALTERNATE A  
DESIGN AND OPERATING INFORMATION  
ONSHORE FACILITY (EXCLUDING PRODUCTION)**

[Response to statements should be: YES, NO, or NA (Not Applicable).]

**D. Facility Tank Car & Tank Truck Loading/Unloading Rack**

Tank car and tank truck loading/unloading occurs at the facility. (If YES, complete 1 through 5 below.)

Yes

1. Loading/unloading procedures meet the minimum requirements and regulations of the Department of Transportation.

Yes

2. The unloading area has a quick drainage system.

NA

3. The containment system will hold the maximum capacity of any single compartment of a tank truck loaded/unloaded in the plant.

Describe containment system design, construction materials, and volume:

Drainage from loading goes into sewer which then runs into the oil separation system - from there into lagoons as described previously. In the event spill rate exceeds capacity of sewer, the surrounding surface area slopes to a containment area greater than the capacity of any single compartment.

4. An interlocked warning light, a physical barrier system, or warning signs are provided in loading/unloading areas to prevent vehicular departure before disconnect of transfer lines.

Yes

Describe methods, procedures, and/or equipment used to prevent premature vehicular departure:

Warning signs are posted at each rack to disconnect all lines before starting truck.

5. Drains and outlets on tank trucks and tank cars are checked for leakage before loading/unloading or departure. Letters have been sent to all trucking firms stating their responsibility in this area - Key stop rack loading - tank cars are inspected by

Name of facility Conoco Inc. - Denver Refinery - Main Plant Conoco personnel.

Operator Conoco Inc.



PART II, ALTERNATE A  
DESIGN AND OPERATING INFORMATION  
ONSHORE FACILITY (EXCLUDING PRODUCTION)

[Response to statements should be: YES, NO, or NA (Not Applicable).]

**E. Security**

1. Plants handling, processing, or storing oil are fenced. Yes
2. Entrance gates are locked and/or guarded when the plant is unattended or not in production. Yes - all but key stop rack
3. Any valves which permit direct outward flow of a tank's contents are locked closed when in non-operating or standby status. No
4. Starter controls on all oil pumps in non-operating or standby status are:  
(a) locked in the off position; No  
(b) located at site accessible only to authorized personnel. Yes
5. Discussion of items 1 through 4 as appropriate: \_\_\_\_\_

Truck loading is done on key stop rack. Only authorized truck drivers have keys and can load their own trucks. The area is fenced with an entrance gate which is not locked or guarded. Due to location, it would not be safe to keep gate locked. Security guards patrol the key stop area routinely each night.

6. Discussion of the lighting around the facility: \_\_\_\_\_

Lighting for the entire refinery and operating facilities is adequate to meet all safety standards and allow surveillance of equipment and tankage.

Name of facility Conoco Inc. - Denver Refinery - Main Plant

Operator Conoco Inc.

SPCC PLAN, ATTACHMENT #1  
SPILL HISTORY

(Complete this form for any reportable spill(s) which has (have) occurred from this facility during the twelve months prior to January 10, 1974 into \_\_\_\_\_ navigable water.)

1. Date \_\_\_\_\_ Volume \_\_\_\_\_ Cause: \_\_\_\_\_

Corrective action taken: \_\_\_\_\_

Plans for preventing recurrence: \_\_\_\_\_

2. Date \_\_\_\_\_ Volume \_\_\_\_\_ Cause: \_\_\_\_\_

Corrective action taken: \_\_\_\_\_

Plans for preventing recurrence: \_\_\_\_\_

3. Date \_\_\_\_\_ Volume \_\_\_\_\_ Cause: \_\_\_\_\_

Corrective action taken: \_\_\_\_\_

Plans for preventing recurrence: \_\_\_\_\_

Name of facility Conoco Inc. - Denver Refinery - Main Plant

Operator Conoco Inc.

SPCC PLAN, ATTACHMENT #2  
OIL SPILL CONTINGENCY PLANS AND  
WRITTEN COMMITMENT OF MANPOWER

Secondary containment or diversionary structures are impracticable for this facility for the following reasons (attach additional pages if necessary):

Yes

A strong oil spill contingency plan is attached.

\_\_\_\_\_

A written commitment of manpower is attached.

\_\_\_\_\_

Name of facility Conoco Inc. - Denver Refinery - Main Plant

Operator Conoco Inc.

SPCC PLAN, ATTACHMENT #3  
ONSHORE FACILITY BULK STORAGE TANKS  
DRAINAGE SYSTEM

Inspection Procedure:

Check visually for oil and grease or sheen. Have laboratory run oil and grease, COD and PH.

Record of drainage, bypassing, inspection, and oil removal from secondary containment:

Date of Drainage	Date of Bypassing		Date of Inspection	Oil Removal	Supervisor's or Inspector's Signature
	Open	Closed			

Name of facility Conoco Inc. - Denver Refinery - Main Plant

Operator Conoco Inc.

(Attachment #3, SPCC Plan)

TO: All Supervisor

FROM: D. R. Unruh

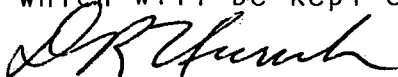
DATE: July 8, 1980

SUBJECT: Denver Refinery - Main Plant - SPCC Plan Record of  
Inspection and Drainage from Diked Areas.

Drainage of rain water from dikes into a storm drain or into an effluent discharge which empties into an open watercourse, lake, or pond may bypass the in-plant treatment system if (a) the bypass valve is normally sealed closed, (b) the effluent is inspected to ensure compliance with applicable water quality standards and that no harmful discharge will occur, (c) the opening and resealing of the bypass valve is conducted under responsible supervisor and (d) adequate records are kept of such events.

Normally any rain water discharge will be inspected by the laboratory before the seal on the bypass valve is broken under the supervisor of the Chief Refinery Chemist. In emergencies the seal may be broken and the bypass valve opened under responsible supervisor after a sample has been obtained for subsequent inspection.

Attachment #3 of this plan will be followed for these records which will be kept on file for minimum of three years.

  
D. R. Unruh

CC: All Supervisors



Conoco Inc.  
5801 Brighton Boulevard  
Commerce City, CO 80022  
(303) 575-6000

July 8, 1980

Gentlemen:

Compliance with federal regulations covering oil pollution prevention and the Spill Prevention Control and Countermeasure Plan for Continental Oil Company, Denver Refinery, requires that you inform your drivers of their responsibility to examine truck outlet manifolds for leakage after each loading and before departure from our keystone loading racks.

Sincerely,

A handwritten signature in cursive script, appearing to read "D.R. Unruh".

D.R. Unruh  
Manager  
Denver Refinery

bam

Acorn Petroleum, Inc.  
P. O. Box 603  
Colorado Springs, Co. 80901

Agland Inc.  
P.O. Box 338  
Eaton, Co. 80615  
454-3391

Asamera Oil (U.S.) Inc.  
5800 Brighton Blvd.  
Commerce City, Co. 80022  
355-7355

Bonded Petroleum  
301 E. Colorado Ave.  
Colorado Sprgs, Co 80903  
573-6923/ 473-5366

Busby, Inc.  
Box 728  
Burlington, Co 80807

Cessa Battery & Supply  
6390 Federal Blvd.  
Denver, Co 80221

Chelf Inc.  
5226 Brighton Blvd.  
Denver, Co. 80216  
623-8261

Chevron Oil Company  
P.O. Box 7066  
Denver, Co.  
399-2070

Clark's Service  
2715 W. Colorado Ave.  
Colorado Sprgs, Co.

Conoco Inc.  
5606 Brighton Boulevard  
Commerce City, Co. 80022  
288-2563

Dauphin Oil Co.  
P.O.Box 195  
Pueblo, Co. 81002

Detamore Oil Co.  
200 E. 1st St.  
Box 49  
Julesburg, Co. 80737

Eveready Freight  
P.O. Box KK  
Buena Vista Co. 81211  
395-2244

Farmland Industries  
P.O Box 815  
Aurora, Co. 80010  
371-9660

George Oil Co.  
508 W. Baseline Rd.  
Lafayette, Co. 80026

Green Bros Oil  
5335 Harrison  
Denver, Co. 80216  
623-5195

Harpel Oil Co.  
5480 Brighton Blvd.  
Commerce City ,Co. 80022  
893-0017

Horizon Oil Co.  
2275 E. Arapahoe Rd.  
Littleton, Co. 80122

Hughes Oil Co.  
P. O. Box 218  
Walden, Co. 80480

J Oil Company  
Box 6667  
Colorado Springs, Co.  
473-5860

James Oil Co.  
210 Depot St.  
Golden, Co. 80401

Kiesling Oil Co.  
P. O. Box 665  
Dillon, Co. 80435

Frank C. Klein  
3600 E. 46th Ave.  
Denver, Co. 80216  
322-0244

Lackey Distribution  
5201 E. 48th Ave.  
Denver, Co. 80216  
399-2931

MD Trucking Corp.  
P.O. Box 735  
Kremmling, Co.  
1-800-332-5851

Mapleton Sales, Inc.  
5755 N. Washington  
Denver, Co. 80216

Pester Colorado Corp.  
P.O. Box 39300  
Denver, Co.  
371-1980

Petco Inc. Interstate  
P.O. Box 446  
Commerce City, Co. 80022  
288-0755

P.I.E.  
P.O. Box 1056  
Commerce City, Co. 80022  
288-1424

Rex Oil Company  
5671 Tejon  
Denver, Co. 80221  
455-1743

Riddell Petroleum  
899 Decatur  
Denver, Co. 80204  
825-8117

Riggie Oil Co.  
430 Second Ave.  
Grand Junction, Co. 81501

Rothman Oil Co.  
P. O. Box 66  
Greeley, Co. 80631  
352-6663

Royal Petroleum  
520 E. 56th Ave.  
Denver, Co. 80216  
629-6412

Salida Transfer  
P.O. Box 447  
Salida, Co. 81201  
539-6511

Sav-O- Mat Inc.  
P. O. Box 9006  
Denver, Co. 80209  
744-1711

Urbom Oil Co.  
1340 N. College  
Ft. Collins, Co. 80524

Varra Companies, Inc.  
Rt. 2, Box 640  
Broomfield, Co. 80020  
666-8269

Vickers Dividend Oil Co.  
6666 Stapleton So. Dr.  
Denver, Co. 80216

Ward Transport  
P.O. Box 100  
Commerce City, Co 80022  
287-0377

Western Tank Lines  
P.O. Box 1036  
Adams City, Co. 80022  
288-7007

Wright Valley Oil  
P.O. Box 28  
Alamosa, Co. 81101

### SAND CREEK INTERCEPTOR TRENCH

In order to prevent oil which has leaked to groundwater, from contaminating Sand Creek, an Interceptor trench has been constructed. The trench has two legs that lead to a sump pit where the oil is skimmed off of the water. (See Drawing No. DR-45-78-1030-25-B for a plot plan of the area and Drawing No. DR-45-78-1030-3-A for a typical cross section of the trench.) After the oil has been skimmed, it is pumped to the sump at 777 Tank and from there to the API traps. (See Drawing No. DR-45-78-1030-26-B for details of the skimmer and the skimming pit.) The water from the sump is pumped to a baffled lagoon and from there it is discharged into Sand Creek under NPDES Permit #Co-0001147, Adams County. The discharge is visually inspected daily for oil skien and the chemical oxidation demand along with oil and grease content is run monthly. The flow measuring device is read weekly or more often. The maximum on oil and grease is 10mg/liter with no limit on flow or on COD.

In order to provide compliance with these limitations, insure optimum operation of the interceptor trench and prevent visible impact of the effluent discharge on Sand Creek, we are committed to the following management practices as a minimum.

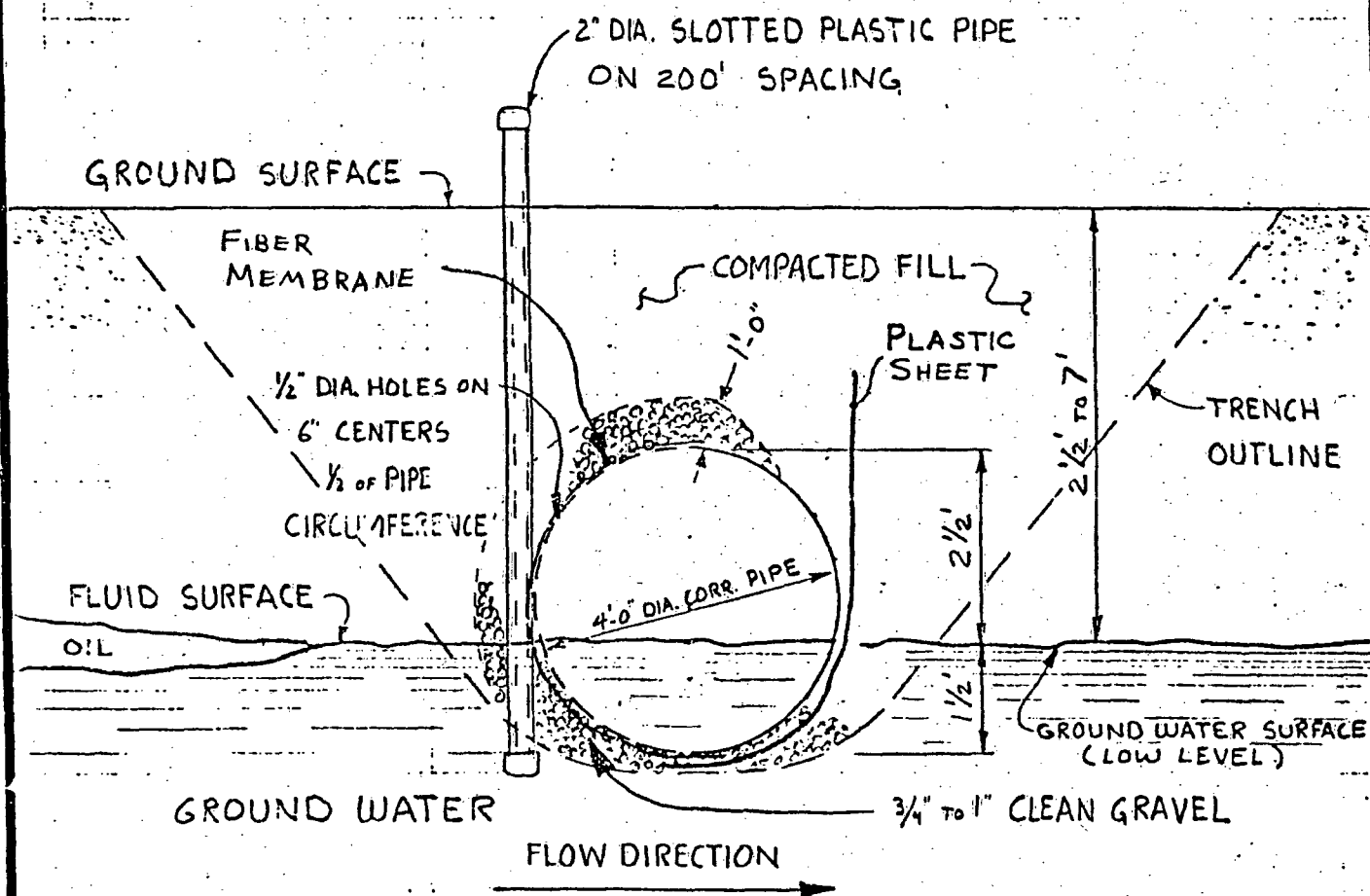
- a) Maintain sufficient depth in the sump to prevent carry over of oil.
- b) Conduct monthly inspections of the trench system, measure liquid level in the trench and maintain reports of the inspections. Inspections shall also include observations of Sand Creek adjacent to the interceptor trench for signs of visible oil. In



Sand Creek Cont.

the event oil is noted, appropriate action shall be taken, to immediately prevent downstream movement of oil. Such action may be placement of sorbent booms for collection of oil. Any oil stained earth found in the area shall be removed and disposed of properly.

- c) The discharge shall not create visible foam or visible growth of deposits in Sand Creek.
- d) Have replacement pump on hand or sufficient repair parts to facilitate timely correction in the event of sump pump failure.
- e) Comply with all appropriate items of stipulation dated September 15, 1978, between Conoco Inc. and the Water Quality Control Division Colorado Department of Health.



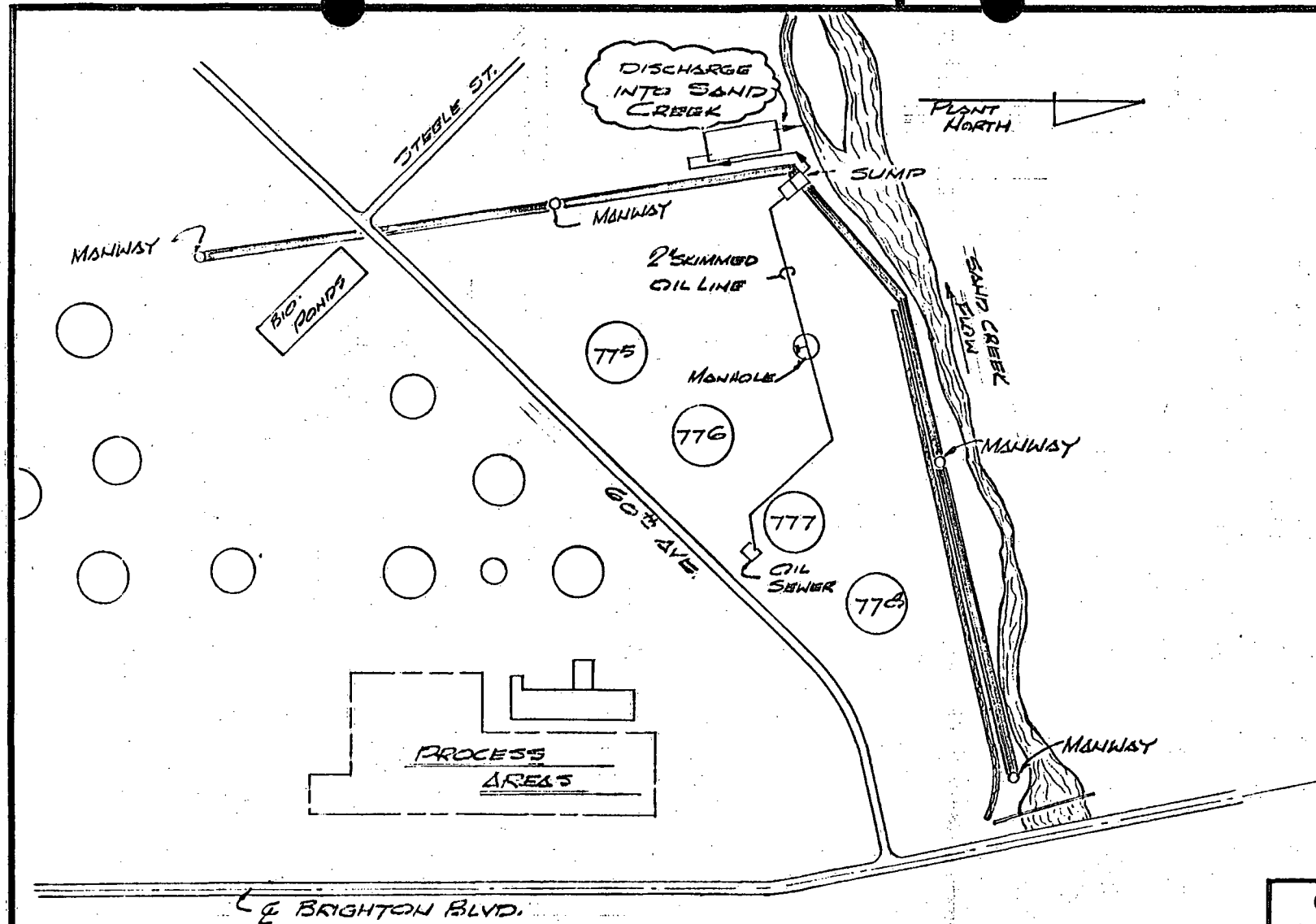
CROSS SECTION INTERCEPTOR TRENCH  
CORRUGATED PIPE

4-280 S

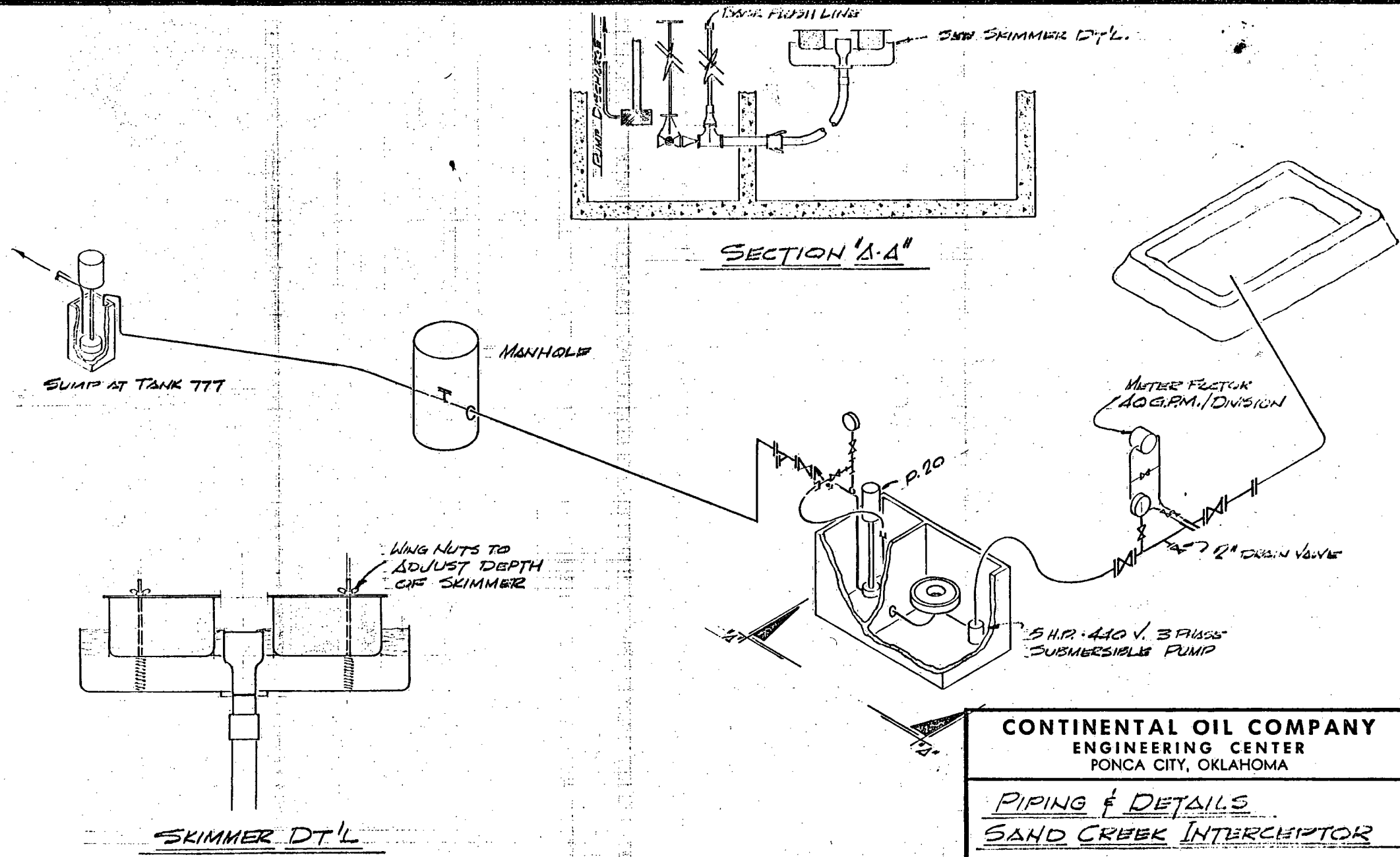
APPROVED

CONTINENTAL OIL COMPANY

No. DR-45-78-1030-3-A



CONTINENTAL OIL COMPANY ENGINEERING CENTER PONCA CITY, OKLAHOMA	
PLOT PLAN SAND CREEK INTERCEPTOR	
SCALE:	
APPD: J. A. Mulvaney DATE: 11/26/17	No. DP-415-12-1030-2112



<b>CONTINENTAL OIL COMPANY</b> ENGINEERING CENTER PONCA CITY, OKLAHOMA	
<u>PIPING &amp; DETAILS</u> <u>SAND CREEK INTERCEPTOR</u>	
SCALE:	
APPD: <i>John Mulhany</i> DATE: 11/28/79	No. DR. 45-75-1030-26-B

COLORADO DEPARTMENT OF HEALTH

Division of Administration

HL WQ HSYL

In the Matter of:	)	
	)	STIPULATION RE CEASE AND
CONTINENTAL OIL COMPANY (CONOCO)	)	DESIST ORDERS AND CLEAN
Adams County, Colorado	)	UP ORDERS ISSUED MAY 17
NPDES Permit No. CO-0001147	)	and MAY 19, 1978

The Water Quality Control Division, Colorado Department of Health ("Division") and Continental Oil Company ("Conoco") agree to take the following actions:

Conoco shall, within the time schedules required in the above referenced orders, as modified by subsequent written communications, and in a workmanlike manner, accomplish the following obligations:

1. Conoco shall promptly commence construction of the interceptor trench as shown on attachments A, B and C and shall diligently complete such construction. Once construction of the interceptor trench is completed, evaluation of the effectiveness of the trench shall consist of:

a) Visual observation of Sand Creek for that portion of the trench paralleling Sand Creek;

b) Monthly monitoring of oil thickness on existing wells downgradient of the Steele Street trench for the first six months following construction. After such time, quarterly monitoring shall be acceptable if the system is functioning satisfactorily;

c) Monthly monitoring of liquid levels in the trench system.

2. During the interim period while construction of the foregoing interceptor trench is taking place, Conoco shall undertake best management practices which shall consist of the following:

- a) Continuous operation of oil mops on the trenches;
- b) Pumping of oil if the mops cannot prevent the accumulation of oil on the trenches;
- c) Pumping the remaining pits on a periodic basis as may be necessary to limit oil accumulation.

3. It is recognized that during construction of the interceptor trench some of the present trenches and pits will necessarily be destroyed by the construction activities. During such time as the work is in progress, Conoco will utilize secondary means, which are adsorbent booms and pads, to collect oil from the surface of Sand Creek.

4. Conoco shall continue its efforts to test oil lines in the next 18 months as specified in Attachment B.

5. Following the completion of construction, all petroleum stained material in the Sand Creek stream bed will be removed and properly disposed.

6. Revise the Spill Prevention Control and Countermeasure Plan submitted September 23, 1976, so as to address leakage to ground waters. A copy of the revised document shall be submitted to the Division within two (2) weeks after completion of construction of the interceptor trench. This is an extension from the date required in the May 17, 1978, Order.

7. Quarterly reports of data obtained from items 1 and 4 will be submitted to the Division. The first report will be due October 30, 1978.

8. Once the interceptor trench has been constructed, Conoco will maintain and operate the system so as to function as designed. If the system is found to be functioning improperly so as to allow the immediate or potential passage of oil, Conoco shall immediately notify the Water Quality Control Division.

9. Conoco will make a diligent effort to remove the oil downgradient of the Steele Street interceptor trench beginning two (2) months after completion of the trench. The method of removal contemplated will be a skimmer system installed in an existing water well on the northeast corner of the Spano property adjacent to the refinery. It is recognized that any plan for removal of oil downgradient of the Steele Street interceptor which requires activity on the Spano property requires the consent of the property owners and is therefore dependent upon their permission.

It is realized that this method of cleanup will not remove all the existing oil. Therefore, if problems arise with oil contamination of surface or ground waters in the future, this portion of the stipulation will be adequately altered to address the situation.

10. Though not a requirement of this Stipulation, the Division suggests quarterly monitoring of existing wells on Conoco property. Such data will be very beneficial in evaluating ground water conditions, oil movement and serve as an early warning system if future leaks occur. Submission of such data will be appreciated but not required.

The Division shall refrain from taking further enforcement actions under said orders so long as Conoco complies with the above obligations.

Based on the above agreement, the Division and Conoco agree:

1. This action shall be dismissed upon order of the hearing officer.

2. Should the above actions not be accomplished in the opinion of the Division so that it initiates further enforcement action under the Orders, Conoco reserves the right to renew its request for a hearing on the subject Orders.

DATED at Denver, Colorado, this 15 day of September, 1978.

WATER QUALITY CONTROL DIVISION  
COLORADO DEPARTMENT OF HEALTH

By Fred Matter  
Fred Matter, P.E., Chief  
Monitoring & Enforcement Section

By Marcia Hughes  
Marcia Hughes  
Assistant Attorney General

CONTINENTAL OIL COMPANY

By R. G. Alexander  
R. G. Alexander, Refinery Manager

By C. R. Hampton  
C. R. Hampton, Senior Counsel



PUMPING & LOADING CALLOUT LIST

1.	R. Bradley	750-1492
2.	A. Smith	770-4995
3.	F. Wyckoff	421-2503
4.	J. Heyd	741-1298
5.	D. Unruh	279-0471
6.	D. Wohlgenant	770-8378
7.	J. Buxton	423-1840
8.	G. Peet	424-2707
9.	W. Guyer	288-4074
10.	K. Beebe	322-9105
11.	D. Dewitz	695-8260
12.	J. Betz	355-6750
13.	B. Roberts	466-8252
14.	H. Dunham	237-0793
15.	K. Skiles	457-1554
16.	W. McCoy	371-4125
17.	J. Petersen	761-6224
18.	J. Patrick	428-1662
19.	J. Wantulok	457-9883
20.	J. Smith	722-9382

R. Bradley or A. Smith will call J. W. Moss (750-4854).

J. W. Moss will call R. T. Smith (429-7423) or L. Ridley (798-4791).

DISTRIBUTION CENTER

1.	Ed Kochevar	979-0359
2.	Howard Smith	756-1075
3.	Frank McCumber	733-2807

MAIN PLANT OPERATING UNIT CALLOUT LIST

1.	R. Bradley	750-1492
2.	A. Smith	770-4995
3.	J. Heyd	741-1298
4.	J. Buxton	423-1840
5.	L. Brandt	659-0318
6.	G. Lepard	320-8411
7.	F. Williamson	288-3530
8.	R. Valesquez	287-4750
9.	E. Rauschenberger	238-9162
10.	B. Starns	452-3536
11.	D. Unruh	279-0471
12.	D. Wohlgenant	770-8378
13.	M. Lyells	451-0458
14.	B. Watkins	422-0453
15.	D. Dewitz	695-8260
16.	J. Betz	355-6760
17.	E. Carpenter	466-8150
18.	B. Roberts	466-8252
19.	H. Dunham	237-0793
20.	K. Skiles	457-1554
21.	W. McCoy	371-4125
22.	J. Petersen	761-6224
23.	J. Patrick	428-1662
24.	J. Wantulok	457-9883
25.	J. Smith	722-9382
26.	D. Creamer	423-4092
27.	A. John	831-4294

R. Bradley or A. Smith will call J.W. Moss (750-4854).

J.W. Moss will call R.T. Smith (429-7423) or L. Ridley (798-4791).

ASPHALT UNIT CALLOUT LIST

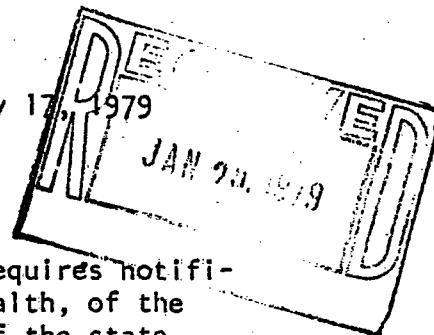
1.	R. Bradley	750-1492
2.	A. Smith	770-4995
3.	L. Heideman	659-1057
4.	J. Heyd	741-1298
5.	D. Wohlgenant	770-8378
6.	H. Reffel	429-6682
7.	D. Unruh	279-0471
8.	J. Buxton	423-1840
9.	D. Pfeif	451-7568
10.	I. Valdez	423-9195
11.	G. Giese	371-6720
12.	D. Dewitz	695-8260
13.	J. Betz	355-6750
14.	B. Roberts	466-8252
15.	H. Dunham	237-0793
16.	K. Skiles	457-1554
17.	W. McCoy	371-4125
18.	J. Petersen	761-6224
19.	J. Patrick	428-1662
20.	J. Wantulok	457-9883
21.	J. Smith	722-9382

R. Bradley or A. Smith will call J. Moss (750-4854). J. Moss will call R. T. Smith (429-7423) or L. Ridley (798-4791).

DISTRIBUTION CENTER

1.	Ed Kochevar	979-0357
2.	Howard Smith	756-1075
3.	Frank McCumber	733-2807

January 17, 1979



## SPILL REPORTING

Colorado State Law, 1973 (C. R. S. (1973) 25-8-601) in part requires notification to the Water Quality Control Division, Department of Health, of the spillage of any material which may cause pollution of waters of the state. This notification must be made by telephone as soon as is practicable. Failure to notify or delayed notification is punishable by a fine of up to \$10,000.00 and/or by imprisonment for up to one year. In addition to reporting a spill, the company responsible should take immediate corrective action to contain and/or remove the substance spilled.

The Federal Water Quality Control Act Amendments of 1972, in part, states that any spill of an oil or hazardous material into navigable waters must be reported immediately to the appropriate federal agency. Failure to report the spill carries a fine of up to \$10,000.00 and/or one year imprisonment. In addition, any spill of oil or a hazardous material to navigable waters shall be assessed a civil penalty by the Coast Guard in an amount not to exceed \$5,000.00.

When a spill of any material occurs which does or may reach any water of the state, surface or groundwater, the spill must be reported immediately by telephone to the following, listed in order of preference:

1. Normal Duty Hours - 8:00 a.m.- 5:00 p.m.:

Colorado Department of Health  
Denver, CO. - Telephone 320-8333, Ext. 3459  
or Ext. 3477

2. Non-duty Hours

Roger Smades - 985-2735  
Fred Matter - 690-7462

If unable to reach either one, call 320-1465

3. If spills are of radioactive hazardous material

Call 320-1465  
Or Al Hazle - 422-4146 during non-duty hours.

4. U. S. Environmental Protection Agency  
Denver, CO.

837-3880 (24-hour contact)

In the event you are unable to contact the State Water Quality Control Division or its personnel, notification of the U. S. Environmental Protection Agency will suffice.

## SPILL REPORTING

NOTE: This supersedes some of the instructions in the Manual For Reporting Spills, dated January, 1975 and the Spill Reporting Sheet dated Dec. 15, 1978.